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February 1, 2010

CLERK, UNITED STATES DISTRICT COURT Martin Luther King, Jr. Federal Building & U.S. Courthouse 50 Walnut Street Newark, NJ 07102

Sandy Almanzar vs. C & C Metal Products, Inc., et al Re:

Case No. 2:07-cv-4002 (JLL)(CCC)

Our File No. 7130-J

Dear Sir or Madam:

This office represents the defendant C & C Metal Products, Inc. in the above captioned matter. We have filed a motion for summary judgment in this matter which is presently returnable on February 16, 2010. Plaintiff recently served opposition to our motion. My associate Diane Lanza, spoke with plaintiff's counsel today, and he has consented to allow me an extension of time to file a reply to his opposition. Therefore, we respectfully request that the Court move the return date of my motion to March 1, 2010, thereby making my reply to plaintiff's opposition due on February 22, 2010.

Very truly yours,

MARTIN, GUNN & MARTIN, P.A.

By: /s/ Richard C. Bryan RICHARD C. BRYAN

RCB:dls Enclosure

William A. Thomas, Esquire cc: Susan J. Levy, Esquire Jeffrey W. Mazzola, Esquire Jerald J. Howarth, Esquire Martha D. Lynes, Esquire Gary B. Cutler, Esquire

SO ORDERED: DATED: